


CODE OF CONDUCT

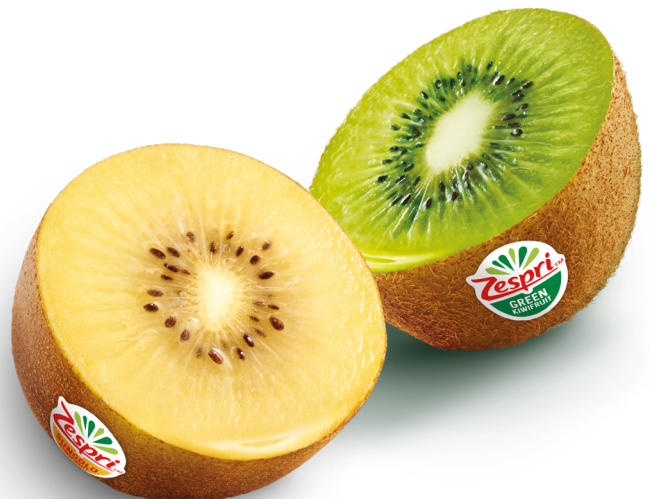


Our commitment to conducting
business legally and ethically



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OUR VALUES

OUR VALUES ARE OUR BELIEFS. OUR CONVICTIONS.
THEY BIND US TOGETHER. THEY'RE IN OUR NATURE.



MAKE IT HAPPEN

We get the job done and support each other to overcome obstacles. We are not afraid to experiment, fail and learn from our mistakes. We take ownership of our actions and the outcomes, aiming for value creation in everything we do.



CREATE REAL CONNECTIONS

We're a business built on relationships, and we collaborate for positive impact. We care personally, and we're not afraid to challenge ideas or to show how we can be better or do differently. We are authentic and seek out and value diverse views.



LEAVE A LEGACY

We seek to understand the world and our place in it. We value and protect our diverse and interdependent community. We work together to create a positive impact for generations to come.

FOREWORD

WELCOME TO OUR CODE OF CONDUCT

At Zespri, we're all about doing the right thing. We owe it to our growers, shareholders, colleagues, communities, customers, and consumers of the Zespri Kiwifruit to stick to the highest standards and stay true to our values.

Our Code of Conduct provides us with the knowledge, clarity, and guidance necessary for growth and success. It is our guide on conducting business in a legal, ethical and sustainable manner, and serves as our guiding light for making sound decisions that reflect the expectations of the industry, our customers and stakeholders.

Upholding the promises we make to each other and our stakeholders is a responsibility shared by all of us. This involves performing our duties to the best of our abilities and applying our values in all our actions to ensure a safe, respectful, and inclusive workplace.

This document outlines our shared set of values and policies that all Zespri people are expected to adhere to. Our continued success depends on each and everyone living our Code.

Report any suspected violations of our Code and seek assistance if you are unsure about the Code's principles, appropriate actions, or your responsibilities in upholding the Code.

Thank you for taking the time to read our Global Code of Conduct and for using the information provided to contribute to Zespri's success by allowing it to guide your actions and interactions with others.

Regards,

Jason Te Brake



WHY WE HAVE OUR CODE

At Zespri, we're on a mission to help people, communities and the environment around the world thrive through the goodness of Kiwifruit. To help us achieve this, we aspire to the highest ethical standards throughout our global operations.

We are focused on a commitment to sound and sustainable business practices both in dealings internally and externally.



Sustainability is a major focus for Zespri and sits at the heart of Zespri's purpose. As an industry, the kiwifruit Zespri produces is in demand around the world for its health benefits and the nutritional boost it offers. Zespri aims to grow sustainably by respecting and protecting its people, environment, and surrounding communities. We therefore must take responsibility for all of our actions and ensure we comply with all relevant policies and this code.

This commitment means complying with both the letter of the law and the spirit of the law. It also means treating stakeholders (growers, customers, suppliers, competitors, colleagues and directors) fairly and with transparency, honesty and respect.

Our commitment to ethical and sustainable conduct is important in everything we do. We hold ourselves to these standards because of our deep commitment to our stakeholders: our growers, shareholders, post-harvest entities, the New Zealand government, customers, employees, vendors, business partners, communities, and countries in which we do business around the world.

Other Zespri policies will continue to be adopted and adapted from time to time in compliance with applicable laws in order to assist with the ongoing compliance and adherence to the principles of this Code. Our people must also comply with any regional or local Zespri conduct related policies or procedures at all times.

In the event of express conflict between this Code and local legal requirements, please contact Zespri's **General Counsel** or the **Head of Risk & Assurance**.

WHO MUST FOLLOW OUR CODE

The Code applies to all individuals working for Zespri, regardless of their location. This includes employees (permanent, temporary, or fixed-term), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, and directors. All are expected to conduct business in accordance with the Code, as well as adhere to all relevant laws and regulations.

We also expect our suppliers and partners in the supply chain to follow similar high ethical standards which we communicate through our Supplier and Partner Code of Conduct.

We use the term “Zespri”, “Organisation”, “Our”, “Us’ or “We” to refer to Zespri Group Limited and all subsidiaries/related entities.

SEEKING GUIDANCE AND REPORTING CONCERNS

ASKING QUESTIONS

In situations where there is uncertainty or a question arises about the appropriate course of action, it is important to seek guidance.

For specific inquiries, individuals can reach out to the appropriate resources listed below:

-  Their immediate People Leader
-  Their Global Executive representative
-  Their local **People team representative**
-  Zespri’s **General Counsel**
-  Group **Compliance Manager or Risk & Assurance Manager**

These contacts are familiar with the laws, regulations, policies and procedures that relate to our work, and they are equipped to address your questions.

REPORTING VIOLATIONS OF THIS CODE AND CONCERNS

We recognise that there may be times when an individual becomes aware of or suspects that a violation of this Code, related policies, or the law has occurred.

We encourage everyone to speak up using the appropriate channel described below. Because the manner in which violations may be reported varies from country to country, consider the appropriate method by which to report, according to the following options:



Bring it to the attention of your local People Leader, or any member of local management, as appropriate.

If you prefer not to go to your People Leader, or your concern was not adequately addressed by your local management, other options may be available.



Internal reports may also be submitted in writing or orally, during a physical meeting, using a phone line, or webform as detailed below:

- A member of the Zespri Risk & Assurance or Legal team,
- Zespri managed Speak Up email address: Speakup@zespri.com



In addition, reports may be made through the Zespri confidential Speak-Up Line:

If you believe that your concern cannot be dealt with appropriately through the other Zespri channels, you can use our externally managed Zespri Speak Up Line. The Speak Up Line is provided by EthicsPoint who is an independent third party provider.

The Speak Up channels are available 24/7, 365 days a year, in multiple languages, online, through mobile access, or for many jurisdictions also via phone. The contact details to report non-compliances through our third party provider are:

ONLINE

Speak Up Service website name: Zespri Confidential Speak Up Line · External
Website URL: www.zespri.ethicspoint.com.

MOBILE

reporting using the QR



BY PHONE

Where enabled for your country.

“ PLEASE ALWAYS SEEK GUIDANCE IF YOU ARE UNCERTAIN ABOUT A PARTICULAR SITUATION ”



COMPLIANCE WITH THIS CODE

Our people and directors are expected to follow all aspects of this Code and all other Zespri policies. Any breaches may result in disciplinary action, up to and including dismissal.

NO RETALIATION

We recognise that, to preserve a culture of integrity and respect, we must protect our people when they speak up. Therefore, Zespri strictly prohibits acts of retaliation against our people for reporting a possible non-compliance or irregularity.

In addition, our people will not be retaliated against for participating in an investigation involving possible violations. Zespri carefully investigates all reports of misconduct consistent with local requirements.

We will: 

- Help this process by cooperating fully and honestly in an investigation of potential illegal or unethical activity.

If an individual believes they have experienced retaliation, they should seek guidance from the appropriate resource through the channels outlined above.

Zespri people will not face retaliation, discrimination, or disciplinary action for refusing to participate in any activity they have reasonably assessed as carrying more than a low risk of bribery, which has not been mitigated by Zespri.



HOW WE UPHOLD OUR CODE

RESPONSIBILITIES WE SHARE UNDER THIS CODE

We work together to uphold our core values. It is a shared responsibility to prevent, improve and, when necessary, report suspected violations of this Code or other Zespri policies. This ensures that potential concerns are addressed before they escalate into significant issues.

We, as Zespri employees, have the empowering responsibility of ensuring that any agreements entered with suppliers and service providers align with our policies. We are committed to making sure our partners acknowledge and uphold our Supplier and Partner Code of Conduct. Together, we can maintain the integrity and excellence of our organization.

Expectation from our People Leaders:

- While it is imperative for everyone to adhere to the Code's principles, our directors, executives and people leaders have additional duties to:
- Lead by example and set the tone
- Ensure that our policies are communicated effectively and are accessible to our employees, extending appropriate policies to our contractors
- Ensure that employees are regularly informed and trained concerning policies relevant to their roles
- Expect and demonstrate ethical behaviour at all times, and actively live by the Zespri values in every action and decision

COMMUNICATION AND ACKNOWLEDGMENT

At the commencement of employment, the People team ensures all new employees (whether permanent, seasonal or temporary) receive the Zespri Code of Conduct.

The General Counsel ensures new directors are provided with and sign the Code of Conduct form as part of their induction.

On an annual basis all employees are asked to confirm compliance with the Code of Conduct and other Zespri policies.



OUR COMMITMENT TO STAKEHOLDERS

As a global business, we acknowledge our responsibility to conduct our activities in the interests of the communities and countries in which we operate. We are committed to ethical and fair business practices, and respect local laws and regulations.

- Zespri fosters a diverse, inclusive work environment free of harassment, non-discrimination and equal opportunities for all. Protecting our people's physical and mental wellbeing provides the foundation for everything we do.
- Handling personal information with respect and care is core to Zespri's success. Good privacy practices help us to meet our legal obligations and maintain our valued reputation.
- Confidential Speak Up channels and policies, **available here**, let employees and third parties raise concerns without the risk of retaliation, reinforcing our supportive and respectful workplace culture.
- We are committed to environmental sustainability by implementing eco-friendly practices across our operations. We aim to minimize our carbon footprint, reduce waste, and promote the use of renewable resources.
- We will not use any form of forced compulsory, trafficked or child labour.
- We have a fair, open and consistent approach to recruitment, selecting the most capable person for the job.
- Our remuneration is fair and equitable, market competitive, flexible, and affordable.

INCLUSION OF OUR CODE OF CONDUCT IN ZESPRI'S BUSINESS RELATIONSHIPS



Our commitment to ethical conduct extends to our business relationships with growers, post-harvest entities, and current or potential business partners and suppliers. Our people and directors are expected to engage fairly with stakeholders and to act in ways that build value and establish relationships based on trust.



We expect our business partners and suppliers to adhere to business conduct consistent with our own. Our expectations are communicated through the Supplier and Partner Code of Conduct.

REPRESENTING THE ORGANISATION

Our behaviour and communication significantly influences how Zespri is perceived within the business community.

We will: 

- Uphold Zespri's and the wider kiwifruit industry's reputation by maintaining high standards of professionalism and ethics in all interactions with both internal and external stakeholders.

CONDUCTING BUSINESS WITH INTEGRITY



COMPLIANCE WITH APPLICABLE LAWS

It is our policy to conduct our business in accordance with applicable laws. We expect our people and directors to use good judgment and common sense in carrying out responsibilities on behalf of Zespri in accordance with the law, and to refrain from illegal conduct.

In particular, we adhere to and advocate the following principles:



The full, fair, accurate, timely and understandable disclosure in reports and documents that we may be required to file with government agencies;



Compliance with both the spirit and letter of all applicable governmental laws, rules and regulations;



Compliance with our internal policies, controls and audit requirements;



Prompt internal reporting of any suspected or known violations of this Code in accordance with the rules set forth in this Code and;



The understanding that failure to comply with this Code may result in disciplinary measures, up to and including termination of employment.

For guidance on whether particular circumstances could involve illegal conduct or about specific laws applicable to certain activities, individuals should consult the Head of Risk & Assurance, General Counsel or the relevant Global Executive for direction and assistance.



ACCURACY OF RECORDS AND DISCLOSURES OF COMPANY INFORMATION

We place a great deal of importance on an honest and accurate presentation of the facts. Our people and directors are expected to maintain records in appropriate detail to reflect our transactions accurately, fairly and completely.

Any public communications and disclosures, including our disclosures and filings with governmental departments, as well as the financial information contained therein, must be complete, fair, accurate, understandable and timely, and in full compliance with the applicable law.

Our people are responsible for the accurate and complete reporting of financial information within their respective areas of responsibility and for the timely notification to senior management of financial and non-financial information that may be material to us. Our consolidated financial statements shall conform to New Zealand IFRS and generally accepted accounting principles and our accounting policies. Local or statutory books and financial statements shall conform to local regulatory statutes.

We will:

- Always truly and accurately reflect the nature of the transactions recorded in the financial records,
- Always accurately disclose and record funds or assets,
- Always disclose payments or purchases as described in the document supporting the transaction.

All Zespri people whose responsibilities include any of the matters described in this section must take the steps necessary to ensure our full compliance.

If anyone becomes aware of any action related to accounting or financial reporting that may be improper, it should be reported immediately, according to the reporting channels described in this document.

DATA RETENTION

At Zespri, carefully maintaining company records and documents is essential. We are all responsible for safeguarding Zespri's information and complying with all applicable laws relating to retaining and disposing of the information in ways that is appropriate and lawful.

Personal information can only be retained for as long as it is necessary for the purpose for which it was collected. Determining the retention period for personal information requires careful analysis.

Only retaining information that we need or must keep will build consumer trust, support improved data quality and reduce data storage costs. Once information is no longer required for valid business or legal purposes or to comply with local retention regulations, these must be identified to the Digital Operations Team as requiring disposal.

We will not:

- Alter, conceal or destruct information that are necessary for compliance purposes, an ongoing investigation or litigation matters, or
- Carry out disposal, unless authorized to do so by the Digital Operations team. Disposal is the sole responsibility of the Digital Operations team.

For enquiries on whether a document should be retained see the Data Retention and Disposal Standard or seek guidance from the Legal, Privacy or Digital team.

PROTECTING ZESPRI'S ASSETS AND REPUTATION



FRAUD PREVENTION



We do not tolerate fraudulent activities. If anyone suspects or discovers that fraud is occurring within Zespri, they should immediately report it according to the reporting channels described above.



For more information, refer to our Fraud Prevention Policy and Fraud Management Plan.

ACCEPTABLE USE OF OUR ASSETS

Our assets are valuable resources that should be used for business purposes only. Our people are expected to care for and use our assets responsibly, ensuring they are protected from theft, misuse and destruction.

Our assets include work devices, equipment, vehicles, computers, software, documents and trademarks. Additionally, assets include information and communication technologies such as phone service, email, internet access and all data housed in our technology assets or cloud systems.

We will not:



- Share content inappropriate for a workplace setting, such as sexual content, inappropriate humour or harassment, etc. Our assets should never be used for outside business activities or for illegal, unethical or any other inappropriate activities.

For more information, refer to our Information Systems Acceptable Use Policy



CONFIDENTIAL INFORMATION

Information is a large part of what allows us to operate successfully. Our people may require access to confidential information in order to perform their jobs. Our stakeholders, including our customers and suppliers, and other individuals and organisations where a business or other relationship exists, are entitled to have their dealings and information treated with appropriate confidentiality and security by our organisation.

Zespri's confidential information is a valuable asset that must be carefully protected.

We will:



- Protect the confidentiality of Zespri's and our stakeholders' information; use the confidential information only for business purposes, and limit disclosure of confidential information, both inside and outside Zespri, only to people who need to know the information for legitimate business purposes.

The disclosure of Zespri confidential information, whether intentional or accidental, can harm us. Before sharing any of our confidential information externally, an appropriate non-disclosure agreement or other confidentiality agreement should be in place.

We will not :



- Sign a stakeholder's non-disclosure agreement or accept changes to our standard clauses without approval from our Legal team.

For more information, please refer to the Intangible Asset Manager.

DELEGATED AUTHORITIES

As outlined in the Global Corporate Delegated Authorities Matrix Policy (commonly referred to as the DAM), some of our people have specific authorisations for decision-making and/or for incurring financial commitments or approving payments on behalf of Zespri, including entering into contracts on behalf of Zespri. Our people are responsible for being familiar with the DAM and ensuring that they only make or authorise operational and financial decisions and transactions, or incur costs on behalf of us, if they are specifically authorised to do so.

For more information, see the Corporate Delegated Authorities Matrix (DAM) Policy.

AVOIDING CONFLICTS OF INTEREST

Conflicts of interest cannot always be avoided, but a conflict of interest that is hiding or poorly managed, may create a risk of allegations that can have a significant negative impact on Zespri's reputation and effectiveness. Conflicts of interest need to be identified, disclosed and effectively managed.

Business and personal situations that have the potential to create a conflict of interest should be avoided.

What is a conflict of Interest?

- A conflict of interest is a situation in which a Zespri person has competing interests or loyalties, financial or otherwise, and where serving one interest could involve working against Zespri's interests.
- A conflict of interest may exist when you or a family member is involved in an activity, or has a personal (including financial) interest, that might interfere with your objectivity in performing Zespri duties and responsibilities.
- Zespri transactions with other business entities must not be influenced by the personal interests or activities. Such conflicts may damage the reputation of Zespri and its representatives.

We will:



- On appointment of a director and periodically after, declare all potential conflicts of interest to Zespri's General Counsel for inclusion in the director's interests register.
- At the commencement of employment report any potential or real conflicts of interest to the People team representative, and declare it in the conflicts of interest register.
- Support our People Leader to manage the conflict of interest appropriately.

Zespri expects all its people to register their real or apparent conflict of interest as it arises. In addition, annually, Zespri requires all employees to complete the Annual Conflict of Interest Declaration.

Once notified of a possible conflict of interest, the individual's People Leader (or General

Counsel in case of a director or CEO) must determine whether the existence of such interest or position is in conflict with this Code or otherwise detrimental to the best interests of Zespri, and determine the final nature of the situation.

In some circumstances, it may not be possible to adequately manage a conflict and may require you to cease either your Zespri interest or the external conflicting interest.

Where a conflict of interest is presumed to exist,

we will not :



Permit the Zespri person to influence or participate in a decision to:

- Award grants or contracts where the employee is connected to a person or organisation that submitted an application or tender.
- Grant a consent, certificate or permit where the employee is connected to the applicant or a person who opposes the application.
- Select or hire someone with whom the employee has a personal connection (familial or otherwise).
- Conduct business with a person or organisation with whom the employee has a personal connection (familial or otherwise).
- Permit the Zespri person to investigate a complaint where they have a personal connection (familial or otherwise) with either the complainant or the person or entity complained about.

For more information, refer to the Conflict of Interest Policy.

POLITICAL CONTRIBUTIONS

Our people are encouraged to participate in their respective country's political process. Our people should, however, only do so voluntarily and during personal time, unless applicable law requires otherwise.

We will not:



- Give political contributions by or on behalf of Zespri unless the contribution has first been approved by General Counsel and the Zespri Group Limited Board.
- Make political donations or contributions using our name, time, funds or other resources.

ENGAGING IN EXTERNAL COMMUNICATION AND MEDIA



Zespri's communications are designed to ensure we're seen as the leading kiwifruit brand. Our public comments should reflect our purpose and values.



Media coverage can impact our reputation, so all Zespri people should be aware that interactions with external stakeholders and social media posts could be reproduced by the media, sometimes out of context.



At Zespri, only trained and authorized people should represent the company to ensure legal compliance and protect our interests. Always act responsibly, avoid sharing sensitive information, and posting anything that may damage Zespri's reputation.

We encourage all Zespri people to be mindful, respectful and truthful when posting online. If you receive an inquiry and are not authorized to respond:

- Be friendly and courteous.
- Do not share information about Zespri.
- Refer the inquiry to the Global Public Affairs & Communication team.




RESPONSIBLE GIFTING, ENTERTAINMENT AND HOSTING

We are committed to living up to the highest standards of professional ethical behaviour, and to remain independent at all times. In developing goodwill and strong working relationships with our stakeholders, appropriate gifts and entertainment can sometimes be offered as standard business courtesies. We have Gifting Policies to guide employees and directors in the appropriate management of these situations. It is the responsibility of our people to ensure that their conduct is in line with this policy in both letter and spirit.

We will:

- Always consider if the offering or accepting of a gift, benefit or hospitality is appropriate, of reasonable value and if approval is required, before the offer or acceptance is made.
- Report any gifts, benefits or entertainment, as per company policy, in the Gift Register and to be transparent and truthful in the interpretation and adherence to these policies.

We will not:

- Exchange gifts if it meets any of the following conditions:
 -  It contravenes any law or generally accepted ethical standard
 -  It is inconsistent with accepted local business practices
 -  It is in a form or manner that could be taken as a bribe or payoff, or it is of such character and/or circumstance that public disclosure has the potential to embarrass us or persons within Zespri



When involved in a negotiation for goods or services to Zespri



Exchanging a gift for cash



Where this could be seen by others as an inducement or reward that could place the recipient under some sort of obligation



When extravagant and excessive or disproportionate in value



When frequent or undue

For further information and guidelines, please refer to Zespri's Travel and Expenses Policy and Gifts, Entertainment and Hospitality Policy.

HOST RESPONSIBILITY

We recognise our people may have a requirement to attend or host social engagements for the purposes of fostering or furthering business. These events should always be respectful of the source of funding, and modest in cost when sponsored by Zespri. The business reasons for any expenditure must be full and clear, with appropriate approvals and supporting documentation.

Whilst attending a Zespri hosted function:

We will:

- Act responsibly and avoid excess alcohol consumption, maintaining everyone's safety as a top priority.
- Embody professionalism and integrity at all times, especially when Zespri is being represented to outside parties.

This infers the use of good judgment and never drinking in a way that leads to inappropriate behaviour, impaired performance or problematic situations for those involved.

We will not:

- Have practices that encourage intoxication.

Behaviour that endangers the safety of others or violates the law may lead to disciplinary action, including dismissal.

Inappropriate use of alcohol may be considered misconduct and would be dealt with in line with local disciplinary policies.

We expect executive and senior management to lead by example and to react appropriately in any problem situation.



PREVENTING BRIBERY AND CORRUPTION

We are committed to complying with all anti-corruption laws in the regions in which we operate. Often anti-bribery and anti-corruption laws extend beyond country borders and any breaches of regulations may have severe consequences, both for the individual and for us.

We will not:



- Tolerate corruption, bribes, kickbacks and facilitation payment.

Zespri takes a zero tolerance approach to bribery and corruption and our interpretation of these laws is clear: we may not engage in any form of bribery or corruption, or offer, authorise or accept or offer any form of kickback to or from, any person or entity to obtain or retain business or other improper advantage, directly or indirectly. "Bribery" is the offering, giving, receiving or soliciting of anything of value in order to obtain or retain business or other improper advantage.

A "kickback" is a payment returned or promised to be returned as a reward for making or fostering business arrangements. Regardless of where we are located, our people or any director acting on behalf of Zespri should not

directly or indirectly (through a third party) give, offer or promise any form of bribe, gratuity or kickback to anyone to obtain or retain business or other improper advantage. While it is always important to comply, this is particularly important when dealing with a government official.

Government officials include, but are not limited to an officer, consultant or employee of a state-owned or partially state-owned enterprise, government department or agency, political party or official, candidate for political office, officer or employee of a public international organization such as the World Health Organization or World Bank, or the spouse or immediate family members of any of the persons mentioned above ("government official").

Facilitation payments on behalf of Zespri are not allowed. These are payments made to a government official to expedite routine government procedures. Consequences for violating anti-corruption laws are severe for both the Organisation and the individuals involved.

For more information, see our Anti-Bribery and Anti-Corruption Policy and the Anti-Bribery and Anti-Corruption Management Plan.



RESPECTING OUR PEOPLE



MAKING ZESPRI A GREAT PLACE TO WORK



At Zespri, our core values, Make it Happen, Create Real Connections and Leave a Legacy, guide all of our interactions within our workplace, reinforcing our Organizational culture, and helping to make Zespri a great place to work. In line with our values, we believe in providing a positive work environment in which communications are both open and respectful.



It is our philosophy and practice to provide employment opportunities in a secure and healthy atmosphere of mutual respect and dignity. Decisions as to hiring, promotion, compensation, termination and other aspects of the employment relationship must be based upon job-related competencies and qualifications, and any other factors required by applicable law.



We maintain policies regarding our commitment to maintaining a positive workplace and the responsibilities of employees.



Additionally, we place high value on the integrity of our people and expect everyone to be respectful, honest and truthful in all of their dealings.

PROMOTING A SAFE, HEALTHY WORK ENVIRONMENT

We are committed to providing our people with a healthy and safe working environment. This includes proactive risk management, worker participation and engagement as well as emergency response plans.

It is our policy to comply with all applicable health and safety laws and regulations wherever we operate, and to take all reasonably practicable steps to promote a healthy and safe

working environment.

In order to meet our commitment to a safe and healthy workplace, we all must do our part.

We will:



- Make sure there are clearly documented safety procedures in place,
- Communicate safety procedures to staff and stakeholders entering the workplace, and support People Leaders to ensure that everyone they work with including contractors and visitors are familiar with and follow relevant safety and wellbeing procedures and instructions,
- Follow the safety laws and procedures,
- Observe posted safety-related signs,
- Use appropriate safety equipment at all times,
- Work together to prevent hazardous or unsafe working conditions,
- Report and escalate any hazardous conditions or unsafe behaviour to your People Leader or a **Health and Safety Committee member**,
- Report near-misses and injuries immediately when they occur,
- Implement mitigating actions to reduce the risk of injury to yourself or others.

Alcohol and illegal drugs do not have any place in a safe work environment. Impairment affects job performance and cause dangerous safety hazards.

Zespri People must also be aware of the possible effects of prescription drugs. With the exception of the reasonable consumption of alcohol at Zespri functions, Zespri People may not be under the influence of alcohol while on Zespri premises. The possession, distribution, sale or use of illegal drugs is expressly prohibited on our premises, and at any time they are working or representing the company.



VALUING DIVERSITY, EQUITY AND INCLUSION



Zespri is a company with people at the heart. We are committed to fostering a diverse, equitable, and inclusive workplace where every individual feels valued and respected. We embrace the richness of our diverse backgrounds, lived experiences, thinking styles, cultures, and identities. By promoting an inclusive culture, we ensure that all employees can contribute to their full potential and thrive.



We believe that diversity, equity, and inclusion are essential to our success. We are dedicated to treating all people with dignity and respect, and we expect everyone in our organization to uphold these principles and contribute positively to an inclusive environment.



Our Diversity, Equity and Inclusion Policy further details this commitment and expectations.

**“WE ARE COMMITTED TO FOSTERING A
DIVERSE, EQUITABLE, AND INCLUSIVE
WORKPLACE”**

PREVENTING DISCRIMINATION, HARASSMENT AND BULLYING

At Zespri, all our people must be treated with fairness, dignity and respect. Everyone in our workplace should experience an environment that is free from discrimination, harassment and bullying. We are committed to fostering a respectful, inclusive, and safe workplace for everyone.

Where team members feel there is inappropriate behaviour, and they feel comfortable to do so, they are encouraged to tell the other person that they object to their behaviour and ask it to stop.

We will: 

- Adhere to our global Anti-Discrimination, Harassment and Bullying Policy, along with local legislation and guidelines where appropriate.
- Encourage our people to report any incidents of harassment or discrimination promptly, and Zespri will take all necessary steps to investigate and address such concerns.

We will not: 

- Tolerate any acts of harassment, whether based on race, colour, gender, age, religion, disability, sexual orientation, or any other characteristic protected by law, or threats of violence.
- Allow discriminatory behaviour, including unwelcome comments, actions, or practices that create a hostile or offensive work environment.

PROTECTING PERSONAL INFORMATION

Personal information is collected directly from employees or is created during the term of employment. Zespri is committed to protecting and managing this personal information in accordance with the principles set out in our Privacy Policy.

We will: 

- Take special care to safeguard information when access to personal information about employees, growers, suppliers, customer, consumers, or other business partners has been given.

Access, use and sharing of personal information must align with the terms in which the personal information was collected. Use or sharing of such personal information in new ways can only occur if consent is obtained or is required to by law.

Use of personal information, including sharing of such information internally or with external parties, must be approved by the Global Data Protection Officer*.

Zespri's General Counsel is your Global Data Protection Officer.

GROWING STRONGER TOGETHER



PROTECTING THE ENVIRONMENT

We take our responsibility for the Environment seriously and strive to reduce our own impacts.

- We are focused in the areas of climate change, water use and quality, and packaging,
- We comply with all relevant legislation and report on our environmental performance,
- We expect our business partners to do the same.

On climate change:

- We assess our risks arising from Climate Change and report on them,
- We are investing to improve the climate resilience of our industry.

On marketing our credentials:

- We understand the laws in countries we operate and ensure we comply with them when it comes to our environmental credentials.

“ WE ARE FOCUSED IN THE AREAS OF CLIMATE CHANGE, WATER USE AND QUALITY, AND PACKAGING ”

SUPPORTING THE COMMUNITY

Our success depends on the well-being of our communities and environment, and the continuous development of industry skills and leadership. At Zespri, we are dedicated to sharing our success and positively impacting our communities. We support local volunteer organizations that do outstanding work with limited resources.



ENGAGING IN THE MARKETPLACE



COMPETING FAIRLY

We compete vigorously in the marketplace but are committed to doing so in a fair, honest, ethical and legal manner, partnering with those who share our values. Our people and directors are expected to conduct their activities on behalf of Zespri in a manner consistent with applicable antitrust and competition laws. Breaches of antitrust or competition laws, or even the allegation of breaches of antitrust or competition laws, can cause serious damage to our reputation and can result in large fines and litigation costs. In some countries, if antitrust or competition laws are violated, the person may be criminally liable for a prison sentence and/or fines. In order to avoid activities that may result in breaches or the allegation of breaches, of antitrust or competition laws.

We will:



- Not intentionally enter into any understanding, agreement, plan or scheme that will breach the antitrust or competition laws in the local jurisdiction;
- Make clear to all customers and distributors that we expect them to compete fairly and vigorously for our business.

We will not:



- Tolerate anti-competitive conduct relating to Zespri Kiwifruit.

GATHERING COMPETITIVE INFORMATION

Keeping current with information about the market and our competitors enables us to compete effectively. However, we can only gather competitive information in a manner that is both ethical and legal.

We will not:



Obtain information about our competitors using:

- Theft
- Deception
- Misrepresentation
- Any other dishonest or illegal conduct

It is especially important that we never ask our people to breach confidentiality agreements with their previous employers, nor should we seek to obtain non-public competitively sensitive information directly from a competitor.



PARTICIPATING IN TRADE ASSOCIATIONS



While we generally avoid interacting with competitors, there may be instances when some type of contact is unavoidable. Organisations and events such as the International Kiwifruit Organisation and Fruit Logistica provide excellent opportunities for us to network and further develop the global kiwifruit category. However, these events also create challenges.



When attending events be careful when interacting with competitors at these events. For any questions regarding acceptable levels of communication, please contact the Zespri General Counsel.

WORKING WITH OUR SUPPLIERS

SOURCING RESPONSIBLY

Sourcing goods and services responsibly is a cornerstone of our procurement practices. We are committed to building sustainable relationships with our suppliers and working closely with those critical to our success, to continuously improve, innovate, and create sustainable value for consumers, customers, and growers. Our approach is to act transparently, lawfully, and with integrity to build trust and maintain the respect of our stakeholders around the globe. We are accountable for our decisions, ensuring that we act responsibly and within the limits of our authority. We aim to foster a procurement environment that prioritizes ethical behaviour, risk management, and good governance across all procurement-led processes. Refer to the Procurement Policy.

We are committed to:



- Building a sustainable future for Zespri, our growers, post-harvest operators, shareholders and all of our wider stakeholders.
- Identifying our customers' needs and providing them with products and services that meet or exceed mutually agreed specifications,
- Ensuring that our economic success is integrated with proactive management of the environment and social aspects of our business,

- Sourcing product from suppliers who operate socially responsible businesses,
- Ensuring our suppliers can demonstrate their commitment to ethical trading norms, their compliance with legal employment requirements and the respect of core labour rights and dignity at work.
- Sourcing and supplying product that meets all regulatory and customer standards and requirements for food safety,

Our expectation is that our suppliers of goods and services respect and enforce ethical values and goals throughout their own supply chains. **Refer to the Zespri Supplier and Partner Code of Conduct.**

PROTECTING HUMAN RIGHTS

We expect our people and stakeholders to comply with all laws and regulations prohibiting child labour, slavery or human trafficking in the countries where we or they operate. We will not do business with any individual or company if we become aware they are engaged in child labour, slavery or human trafficking.

We will:



- Report any stakeholder relationship or transaction with Zespri that violates any portion of this Code using the reporting channels set out in this document.

QUESTIONS ABOUT OUR CODE OF CONDUCT

For clarification of any of the issues in this code please contact the People, Legal or Risk & Assurance Teams

THIS CODE IS MAINTAINED BY

Chief People Officer

DISCLAIMER:

Company policies are an important mechanism for employee understanding of business processes and standards expected from Zespri. Managers are required to ensure that their direct reports are aware of business policies, and that these policies are being followed. When developing new policies and processes, managers and employees should consider where opportunities for inappropriate activity may be created and provide appropriate mitigation controls to reduce the opportunity. Zespri policies are to be reviewed periodically by the business to ensure that they are still current and relevant. Any changes to existing policies or any new policies must be communicated to employees in a timely manner.

CODE UPDATED: MAY 2025

